

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Allergy Partners, P.A.,)	Civil Action No. 6:16-cv-00089-HMH
)	
Plaintiff,)	
)	JOINT RULE 26(f) REPORT DISCOVERY
v.)	PLAN
)	
Mark Cox and Larry Zimmerman d/b/a)	
Allergy Partners, Unknown Entities 1-10)	
and John Does 1-10,)	
)	
Defendants.)	
)	

The parties respectfully submit the following information required by Federal Rules of Civil Procedure 26(f) and this Court's Scheduling Order. A pre-trial discovery conference was held on Friday, June 3, 2016. Attorney Jason Pittman participated on behalf of Defendants Mark Cox and Larry Zimmerman, and attorney William H. Foster participated on behalf of Plaintiff Allergy Partners, P.A. ("Allergy Partners").

The following constitutes the parties' agreement pursuant to that meeting:

RULE 26(F) DISCOVERY PLAN

(A) What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when disclosures under Rule 26(a)(1) were made or will be made?

RESPONSE: None. The parties have agreed to exchange Rule 26(a)(1) disclosures on or before Friday, June 24, 2016.

(B) The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused upon particular issues.

RESPONSE: The parties presently believe that discovery should be completed within the time set forth in Conference and Scheduling Order entered on May 23, 2016. At this point, the parties do not believe discovery should be conducted in phases and agree that the subjects on which discovery may be needed relate to the claims and defenses set forth in Plaintiff's Complaint and Defendants' Answers thereto and counterclaims.

(C) Any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced.

RESPONSE: None at this time.

(D) Any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order.

RESPONSE: None at this time. The parties have agreed to mutually prepare and submit a consent confidentiality order for the Court's consideration.

(E) What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed?

RESPONSE: None at this time.

(F) Any other orders that should be entered by the court under Rule 26(c) or under Rule 16(b) and (c).

RESPONSE: None at this time. Counsel anticipates that discovery will involve issues related to commercially sensitive information and/or documents. Counsel will confer regarding

an appropriate consent confidentiality order and intend to submit the same to the Court for consideration once completed.

Respectfully submitted this 21st day of June 2016,

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